

**Cal/EPA's Response to the County of San Diego's
Deficiency Progress Report (Update 1)**

**CUPA: County of San Diego, Department of Environmental Health
Hazardous Materials Division**

Date of Evaluation: April 23 and 24, 2008

Date Update 1 submitted: July 24, 2008

Cal/EPA, DTSC and SWRCB response

Deficiency 1: The SWRCB evaluator is pleased with the progress the CUPA is making to correct this deficiency; however, the UPCF's are only part of the submittals that must be in the file. Other submittals required for a Permit to Operate include Financial Responsibility, Operator statement of compliance, Designated Operator assignment, Site Plan, Response Plan, etc. Many of these may have already been submitted and in the electronic file. Include in the correction plan a mechanism or procedure to review files to ensure that all the required submittals are accounted for, and how the newly submitted forms will be handled and incorporated into the files.

Deficiency 2: Cal/EPA feels the plan developed by the CUPA should address this deficiency. Cal/EPA will continue to monitor the progress being made to correct this deficiency. In the next deficiency progress report, please update Cal/EPA on the progress of receiving the required information from all of the regulated facilities not just permitted agricultural sites.

Deficiency 3: DTSC will continue to monitor the progress the CUPA is making towards correcting this deficiency until the new form is approved by the County's legal counsel and is being utilized by the CUPA.

Deficiency 4: The corrective action taken by the CUPA sufficiently correct this deficiency, not further updates are necessary for this deficiency.